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8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 LISA SPENCER, an Individual,  
10 Plaintiff,

11 vs.

12 STATE OF NEVADA, ex rel., DIVISION  
13 OF CHILD AND FAMILY SERVICES, a  
State Agency,

14 Defendant.

15 **CASE NO.: 2:19-cv-00953-JAD-GWF**

16 **STIPULATION AND ORDER FOR**  
**EXTENSION OF TIME FOR**  
**PLAINTIFF TO RESPOND TO**  
**DEFENDANT'S MOTION TO**  
**DISMISS PLAINTIFF'S**  
**COMPLAINT**

17 **(First Request)**

18 IT IS HEREBY STIPULATED by and between the parties hereto through their  
19 respective attorneys that Plaintiff Lisa Spencer may have additional time within which  
20 to submit Plaintiff's Opposition to Defendant's Motion to Dismiss Plaintiff's  
21 Complaint.

22 1. Under the Federal Rules of Civil Procedure, Plaintiff's Opposition would  
23 be due August 6, 2019. See Fed. R. Civ. P. 12(a)(4)(A).

1       2. On August 6, 2019, Marta D. Kurshumova, counsel for Plaintiff, conferred  
2 with Stephanie A. Charter, counsel for Defendant, regarding the timing of Plaintiff's  
3 Opposition. Counsel for Defendant consented to Plaintiff's request to enlarge the time  
4 for filing the reply by four (4) days, which would make the new deadline Friday, August  
5 9, 2019.

6       3. Good cause exists for this extension as Ms. Kurshumova is new to the case  
7 and needs additional time to review the case file.

8       4. The extension will not result in undue delay in the administration of this  
9 cause.

10      5. No other enlargement of time has been previously requested in this case.

11      This document is being electronically filed through the Court's ECF System. In  
12 this regard, counsel for Plaintiff hereby attests that (1) the content of this document is  
13 acceptable to all persons required to sign the document; (2) Defendant's counsel has  
14 concurred with the filing of this document; and (3) a record supporting this concurrence  
15 is available for inspection or production if so ordered.

16  
17  
18      **IT IS SO ORDERED.**

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20  
21        
22      \_\_\_\_\_  
23      UNITED STATES DISTRICT JUDGE  
24      Dated: August 9, 2019.

1 Dated: August 6, 2019

2 OFFICE OF THE ATTORNEY GENERAL

3 By: /s/ Stephanie Charter  
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11 *Attorneys for Defendant*

12 Dated: August 6, 2019

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14 By: /s/ Marta Kurshumova  
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24 *Attorneys for Plaintiff*

16 **ORDER**

17 **IT IS SO ORDERED:**

18 Dated: \_\_\_\_\_, 2019

19  
20  
21 United States Magistrate Judge  
22  
23  
24